{In Archive} Notes from Texas Offshore Port System (TOPS) Mtg. on 8/26/08

Stephanie Kordzi to: Jeffrey Robinson 08/28/2008 01:47 PM
Cc: Rob Lawrence, Erik Snyder, Bonnie Braganza, Bruced Jones

From: Stephanie Kordzi/R6/USEPA/US
To: Jeffrey Robinson/R6/USEPA/US@EPA,
Cc: Rob Lawrence/R6/USEPA/US@EPA, Erik Snyder/R6/USEPA/US@EPA, Bonnie Braganza, Bruced Jones/R6/USEPA/US@EPA

History: This message has been forwarded.
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Jeff,

This is a summary of the highlights of the meeting with EPCO and ENSR on 8/26/08 regarding the proposed TOPs air permitting procedures. ***Rob, Bruce, and Erik if you have any additions/revisions, please advise.*** Thanks.

The company discussed the following during the meeting:

Project Information

- Project is similar to the LOOP project off the coast of Louisiana.
- Pipeline will carry crude oil only.
- Oil transfer rate thru the pipeline will be 100,000 barrels per hour.
- Platforms are 35 miles offshore. One platform is for pumping oil, the other platform is for worker's quarters (will need a NPDES permit). Platforms are approximately 150' apart.
- Pipeline will cross Quintana Island. A booster pump station is located 10 miles inland. Currently there are 3.3 million barrels of storage capacity. An additional 3.9 million barrels of storage capacity will be constructed.
- A 36" line will be constructed to tie into existing pipeline structure to Port Arthur. This pipeline will eventually connect to the expanded Motiva Refinery.
- Air permit application will be submitted late October 2008.
- Projecting NOx emission rate from turbines at 25 ppmvd. They do not believe SCR is BACT, they believe it is LAER. They believe NOx BACT is good management practices.
- Modeling protocol information will be submitted in 1 week to EPA. The company inquired as to the EPA response time. Erik Snyder projected 1-2 weeks.

Project Issues/Questions

- Facility will not have control over incoming (international) ships and therefore cannot dicate BACT emission rates (type of operation, type of fuel, etc.). Facility can only control emissions from platforms. Company indicates that TCEQ SIP only requires that company maintain emission rates for the units for which it has "control" - *I will check on this to confirm.* **How do you determine BACT?**
- 2 Platforms located 35 miles offshore of the TX coast (as the crow flys - from the Houston-Galveston-Brazoria non-attainment area). **Will non-attainment requirements apply (offsets/LAER)?**
- **How are operating scenarios modeled with no idea what type of ships will be offloading at the platform?**
- **What exclusion zone should be used?** (Coast Guard dictates a minimum of 500 meters).

Important Note:

- The company believes that by allowing ships to offload into the pipeline 35 miles offshore, that significant air pollution and traffic congestion will be prevented around the Houston ports. Every barrel of oil that is offloaded results in that much less oil that has to be lightered. They are considering estimating the amount of reductions that could occur - however this would need to be offset with the additional oil (over current levels) that would be coming in due to the increase in refinery capacity from both Motiva and Valero.

Texas getting a floating oil port

Prompted by refinery expansions, Houston partnership is planning a $2 billion terminal 36 miles off the coast of Freeport

By TOM FOWLER Copyright 2008 Houston Chronicle
Aug. 18, 2008, 2:30AM

As politicians continue to debate how to reduce U.S. dependency on foreign oil, a Houston partnership is spending $2 billion to prepare for an energy future that inevitably will include oil imports.

The team will announce today that it plans to build and operate an oil terminal 36 miles off the coast of Freeport.

Enterprise Products Partners and TEPPCO Partners, both affiliated with Houston billionaire Dan Duncan, and the German company Oiltanking Holdings Americas, call the project the Texas Offshore Port System — TOPS.

It would include two floating connections for supertankers to unload crude, 160-miles of pipelines to bring the oil onshore and along the coast to refineries in Houston, Port Arthur and Beaumont, as well as new onshore storage for more than 5 million barrels of crude. Exxon Mobil Corp. and Motiva have committed to take shipments through the system for their coastal refineries.

Motiva is a joint venture of Royal Dutch Shell and Saudi Arabia's state-owned oil company Aramco.

When it begins operations, which could be as early as 2010, the $1.8 billion project will be able to unload up to 1.8 million barrels per day, about 18 percent of the current U.S. oil imports.

"The main catalyst for this project is the expansion that's taking place at refineries along the Texas Gulf Coast," said Wynne Harvey, a director of commercial development with Enterprise.

More barrels

The coastal region from Freeport north to Houston and Port Arthur has about 3.6 million barrels

per day of oil refining capacity, according to the companies. About 2.5 million barrels per day of that oil comes in on tankers.

But major refinery expansions will increase the need for oil in the region. The upgrades include two in Port Arthur — Motiva's $7 billion, 325,000 barrel-per-day expansion and San Antonio-based Valero's $1.4 billion, 105,000 barrel-per-day expansion.

Texas ports are not deep enough to accommodate the largest oil tankers, so oil arriving from the Middle East, Nigeria, Venezuela and other foreign sites on supertankers must be transferred to smaller ships for transport to the refineries, a process called lightering. The largest supertankers carry about 2 million barrels of oil and typically offload to four smaller tankers.

The TOPS project would be in 115 feet of water, so even the largest tankers will be able to anchor next to a buoy with pipes connecting it to a pumping station that will move the oil to shore.

"This would provide an alternative to lightering, help reduce congestion in the Houston Ship Channel and other ports and help companies avoid extra port fees," said Jim Schepens, head of commercial development for Oiltanking.

The offshore terminal also is less likely than a coastal port to be shut down by fog and can operate around the clock.

In addition to cutting back on tanker traffic in ports, the terminal may help reduce the risk of oil spills.

About 34 percent of all oil spills between 1974 and 2007 worldwide occurred while tankers were being loaded or unloaded, according to data compiled by the International Tanker Owners Pollution Federation. Cutting back on lightering reduces the number of spill opportunities.

Lightering led to at least three spills off Freeport and Galveston between 1993 and 1995, ranging from 65 barrels to more than 800 barrels spilled, according to the data.

Approval pending

The TOPS project will be similar to the existing Louisiana Offshore Oil Port, known as the LOOP, which started up in the late 1970s. With a capacity of about 1.2 million barrels per day the LOOP takes in an estimated 12 percent of the annual U.S. crude oil imports. Earlier this year the facility pumped its 8 billionth barrel of crude.

Harvey said TOPS will be near Freeport because the water reaches the 115-foot depth there closer to shore than in areas farther east, helping cut undersea pipeline costs. And by coming ashore near Freeport the terminal can serve future customers in the massive chemical refining complex there or at refineries farther south.

The offshore terminal will require approval by the U.S. Coast Guard, while the onshore pipeline and storage facilities will be subject to review by the U.S. Environmental Protection Agency, Army Corps of Engineers and Department of Transportation.

tom.fowler@chron.com

Stephanie Kordzi
Environmental Engineer
Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, TX 75202
(214) 665-7520
FAX (214) 665-6762

{In Archive} Fw: TOPS Fact Sheet for Tom/Carl Briefing

Jeffrey Robinson to: Jeffrey Robinson 03/05/2018 07:49 AM

From: Jeffrey Robinson/R6/USEPA/US
To: Jeffrey Robinson/R6/USEPA/US@MSO365,
Archive: This message is being viewed in an archive.

----- Forwarded by Jeffrey Robinson/R6/USEPA/US on 03/05/2018 07:50 AM -----

From: Stephanie Kordzi/R6/USEPA/US
To: Jeffrey Robinson/R6/USEPA/US@EPA,
Cc: Rob Lawrence/R6/USEPA/US@EPA
Date: 09/04/2008 03:57 PM
Subject: TOPS Fact Sheet for Tom/Carl Briefing

Jeff,

Let me know if you have any comments on the briefing sheet for Tom/Carl. I never officially received word from Margaret that the 3:15 meeting tomorrow was cancelled. I'm hoping that Carl will have a change of heart and stay for us because we are special.

TOPS Briefing Sheet 9-5-08.doc

Stephanie Kordzi
Environmental Engineer
Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, TX 75202
(214) 665-7520
FAX (214) 665-6762

BRIEFING SHEET - Texas Offshore Port System (TOPS)

Project Background:

- Air permit application will be submitted late October 2008 as part of the Deepwater Port Act license application to be filed with the Maritime Administration / US Coast Guard.
- Project is similar to the LOOP project off the coast of Louisiana.
- Pipeline will carry crude oil only. Two interconnected platforms located 35 miles offshore.
- A pipeline will be constructed to tie into existing pipeline structure to Port Arthur and will eventually connect to the expanded Motiva Refinery. Some of the crude also goes ExxonMobil Baytown Refinery, likely through an existing pipeline.

Project Issues/Questions:

- 2 Platforms, located 35 miles offshore of the TX HGB non-attainment area. **Will non-attainment requirements apply (offsets/LAER)?**
- Facility cannot control incoming ship emissions, it only controls platform emissions. Company indicates TCEQ SIP requires company maintain emission rates for units under its "control" only. **What emissions must be included in PTE? How are operating scenarios modeled with no idea what type of ships will be offloading?**
- Projected NOx emission rate from turbines is 25 ppmvd. Facility's position - LAER does not apply (SCR on turbines) to reduce NOx and further indicated SCR use could introduce ammonia to platform, introducing problems. Facility defined BACT as applying - good management practices **BACT or LAER?**

TOPS vs Louisiana Offshore Oil Port (LOOP)

- LOOP located within 20 miles of Lafourche Parish, Louisiana. TOPS located within 35 miles of Brazoria County, TX.
- LOOP located offshore of attainment area. TOPS located offshore of non-attainment area.
- NEPA review for LOOP addressed onshore emissions, not offshore. NEPA review for TOPS will address both offshore and onshore emissions.
- LOOP does not have an air permit. EPA Enforcement will be contacted regarding the need for a PSD applicability determination. TOPS is applying for an air permit.

Important Note:

The company believes that by allowing ships to offload oil into the pipeline 35 miles offshore, significant air pollution and traffic congestion will be prevented around the Houston / Sabine Pass ports. Every barrel of oil that is offloaded at the DPA terminal results in that much less oil that has to be lightered. They are considering development of an estimate of the amount of reductions that could occur. However, there is no guarantee that the freed up existing ship traffic would not be used by other shippers to meet the need for additional crude imports.

Prepared by: Stephanie Kordzi
Date: September 5, 2008

{In Archive} Need for PSD Applicability Determination - LOOP
Stephanie Kordzi to: Jeffrey Robinson 09/05/2008 08:05 AM

From: Stephanie Kordzi/R6/USEPA/US
To: Jeffrey Robinson/R6/USEPA/US@EPA,
Archive: This message is being viewed in an archive.

Jeff,

I propose that you send the following e-mail to Air Enforcement regarding the need for a PSD Applicability Determination for LOOP.

Air Enforcement:

We have recently been speaking with a future air permit applicant, the Texas Offshore Port System. In our discussions with them, we have become aware of a similar operation, the Louisiana Offshore Oil Port, which began operations in the mid 70s. It appears that this facility is operating without an air permit. At the time EPA issued the initial water permit, there was no determination made that the facility needed to apply for an air permit.

We recommend that EPA Air Enforcement review this case and make a determination whether this facility is subject to the provisions of the Clean Air Act and thus be required to submit an air permit application to EPA. The facility did receive a National Pollutant Discharge Elimination System (NPDES) permit (see attachments below).

Louisiana Offshore Oil Port (LOOP) - Description of project (from NPDES permit).

Applicant Activity - According to the application, LOOP LLC, Deepwater Port Complex, operates an offshore petroleum offloading terminal and onshore pipeline and storage facilities for the transporation of crude oil. Crude oil is offloaded from supertankers at the port and transported via pipeline to the Clovelly Dome Storage Terminal Facility (CDSTF) and the Clovelly Tank Facility (CTF). These storage facilities provide interim storage for crude oil before it is delivered via pipelines to refineries. The CDSTF uses brine, stored in a 280-acre Brine Storage Reservoir, to displace crude oil from the caverns for injection into the pipelines. LOOP also operates the Small Boat Harbor facility, the Fourchon Booster Station, and the Operations Center and Warehouse in support of the activities at the facility.

For your information and reference, I am attaching the NPDES permit and NPDES Statement of Basis which contains contact and location information for the facility.


EPA_PERMIT.wpd


EPA_FACTSHEET.wpd

Stephanie Kordzi
Environmental Engineer
Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, TX 75202
(214) 665-7520
FAX (214) 665-6762

{In Archive} LOOP Referral

Jeffrey Robinson to: David Garcia, Steve Thompson, Esteban Herrera 10/14/2008 07:03 AM

Cc: Stephanie Kordzi

From: Jeffrey Robinson/R6/USEPA/US
To: David Garcia/R6/USEPA/US@EPA, Steve Thompson/R6/USEPA/US@EPA, Esteban Herrera/R6/USEPA/US@EPA,
Cc: Stephanie Kordzi/R6/USEPA/US@EPA
Archive: This message is being viewed in an archive.

Air Enforcement:

We have recently been speaking with a future air permit applicant, the Texas Offshore Port System which will be located appx. 35 miles off the the Texas coast near Freeport, TX. In our discussions with them, we have become aware of a similar operation, the Louisiana Offshore Oil Port (LOOP), which began operations in the mid 70s. It appears that this facility is operating without an air permit. At the time EPA issued the initial water permit, there was no determination made that the facility needed to apply for an air permit. Please let us know if you are aware of any applicability determiantion being performed for the LOOP project.

We recommend that EPA Air Enforcement review this case and make a determination whether this facility is subject to the provisions of the Clean Air Act and thus be required to submit an air permit application to EPA. The facility did receive a National Pollutant Discharge Elimination System (NPDES) permit (see attachments below).

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EPA_PERMIT.wpd


EPA_FACTSHEET.wpd

{In Archive} Re: LOOP Referral
David Garcia to: Jeffrey Robinson 10/14/2008 07:26 AM
Cc: Esteban Herrera, Stephanie Kordzi, Steve Thompson

From: David Garcia/R6/USEPA/US
To: Jeffrey Robinson/R6/USEPA/US@EPA,
Cc: Esteban Herrera/R6/USEPA/US@EPA, Stephanie Kordzi/R6/USEPA/US@EPA, Steve Thompson/R6/USEPA/US@EPA

History: This message has been forwarded.
Archive: This message is being viewed in an archive.

Thanks Jeff, We need to first check if we have authority to enforce 35 miles off shore. Haven't you all issued permits to such sites.? What is your range (off shore) of Part 71 authority.? I assume this facility did not submit a permit application to you all.

David F. Garcia,
Air/Toxics Inspection and Coordination Branch
Associate Director
USEPA, Region 6
ph (214) 665-7593, fax (214) 665-7446
email: garcia.david@epa.gov

Jeffrey Robinson/R6/USEPA/US

Jeffrey Robinson/R6/USEPA/US
10/14/2008 07:03 AM

To David Garcia/R6/USEPA/US@EPA, Steve Thompson/R6/USEPA/US@EPA, Esteban Herrera/R6/USEPA/US@EPA
cc Stephanie Kordzi/R6/USEPA/US@EPA
Subject LOOP Referral

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Stephanie Kordzi to: David Garcia 10/14/2008 08:18 AM

Cc: Esteban Herrera, Jeffrey Robinson, Steve Thompson, Bruced Jones, Rob Lawrence

From: Stephanie Kordzi/R6/USEPA/US
To: David Garcia/R6/USEPA/US@EPA,
Cc: Esteban Herrera/R6/USEPA/US@EPA, Jeffrey Robinson/R6/USEPA/US@EPA, Steve Thompson/R6/USEPA/US@EPA, Bruced Jones/R6/USEPA/US@EPA, Rob Lawrence/R6/USEPA/US@EPA
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Hi David,

Hopefully I can clarify. Region 6 has 4 offshore facilities for which we have permitting jurisdiction.

(1) LOOP - I am not sure of the distance that the LOOP facility is offshore of LA. LOOP did not submit an air application (in the 70's, when they began operation) - we believe they may need to submit one (they are permitted under NPDES for a water discharge).

(2) The Texas Offshore Port System (TOPS) is 35 miles offshore of TX. We are currently in discussions with them regarding whether nonattainment requirements apply. TOPS has submitted preliminary air permit application information to us that we are currently evaluating. They also plan to obtain a NPDES permit.

To date, we have never issued an air permit to an offshore pipeline project - but we are currently going through the permitting motions for TOPS.

(3) Port Pelican - Region 6 issued air permit to offshore LNG located 37 miles offshore of LA.

(4) Gulf Gateway - Region 6 issued air permit to offshore LNG located 116 miles offshore of LA.

Ray Magyar and Jon York were involved in the review of these permit actions.

Stephanie Kordzi
Environmental Engineer
Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, TX 75202
(214) 665-7520
FAX (214) 665-6762
David Garcia/R6/USEPA/US

David Garcia/R6/USEPA/US
10/14/2008 07:26 AM

To Jeffrey Robinson/R6/USEPA/US@EPA
cc Esteban Herrera/R6/USEPA/US@EPA, Stephanie Kordzi/R6/USEPA/US@EPA, Steve Thompson/R6/USEPA/US@EPA
Subject Re: LOOP Referral

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Jeffrey Robinson/R6/USEPA/US

Jeffrey Robinson/R6/USEPA/US
10/14/2008 07:03 AM

To David Garcia/R6/USEPA/US@EPA, Steve Thompson/R6/USEPA/US@EPA, Esteban Herrera/R6/USEPA/US@EPA
cc Stephanie Kordzi/R6/USEPA/US@EPA
Subject LOOP Referral

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before it is delivered via pipelines to refineries. The CDSTF uses brine, stored in a 280-acre Brine Storage Reservoir, to displace crude oil from the caverns for injection into the pipelines. LOOP also operates the Small Boat Harbor facility, the Fourchon Booster Station, and the Operations Center and Warehouse in support of the activities at the facility.

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EPA_PERMIT.wpd


EPA_FACTSHEET.wpd

{In Archive} Fw: LPC.100001sob
Jeffrey Robinson to: toups.bradley, toups.brad 04/12/2011 12:36 PM

From: Jeffrey Robinson/R6/USEPA/US
To: toups.bradley@epa.gov, toups.brad@epa.gov,
Archive: This message is being viewed in an archive.

Please let me know which of the two email addresses works for you. Thanks.

----- Forwarded by Jeffrey Robinson/R6/USEPA/US on 04/12/2011 12:36 PM -----

From: Bonnie Braganza/R6/USEPA/US
To: Jeffrey Robinson/R6/USEPA/US@EPA
Cc: Shannon Snyder/R6/USEPA/US@EPA
Date: 04/12/2011 10:56 AM
Subject: LPC.100001sob

This one we seem to have missed- but the facility should have had a PSD permit and has modified several times- Anyway no GHG has been evaluated

POSITIONS or VIEWS EXPRESSED DO NOT REPRESENT OFFICIAL EPA POLICY

Bonnie Braganza
US EPA Region 6
Air Permits Section
Multimedia Permitting & Planning Division
Phone:214 -665-7340
Fax: 214-665-6762

Remember Life Rewards Actions!
And if you continue to do what you have always done, you will get what you always got!

 - LPC.100001sob.rtf

{In Archive} LPC.100001sob
Bonnie Braganza to: Jeffrey Robinson 04/12/2011 10:56 AM
Cc: Shannon Snyder

From: Bonnie Braganza/R6/USEPA/US
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LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL SERVICES

STATEMENT OF BASIS[1]

PROPOSED PART 70 OPERATING PERMIT 1560-00027-V0
PORT COMPLEX
LOOP LLC
GALLIANO, LAFOURCHE PARISH, LOUISIANA
Agency Interest (AI) No. 4634
Activity No. PER20100001

I. APPLICANT

The applicant is: LOOP LLC
137 Northpark Dr.
Covington, LA 70433

Facility: Port Complex

SIC Code: 4612

Location: Four miles northeast of Galliano.

II. PERMITTING AUTHORITY

The permitting authority is: Louisiana Department of Environmental Quality
Office of Environmental Services
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

III. CONTACT INFORMATION

Additional information may be obtained from:

Mr. Syed Quadri
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313
Phone: (225) 219-3181

IV. FACILITY BACKGROUND AND CURRENT PERMIT STATUS

LOOP LLC - Port Complex consists of pipeline terminal facilities existing in Galliano and Leeville located in Lafourche Parish. The LOOP LLC - Port Complex currently operates under Permit No. 1560-00027-03, issued June 12, 2007.

This will be the initial Part 70 permit for the Port Complex and addresses all emissions unit at the Port Complex.

---

[1] 40 CFR 70.7(a)(5) and LAC 33:III.531.A.4 require the permitting authority to "provide a statement that sets forth the legal and factual basis for the proposed permit conditions of any permit issued to a Part 70 source, including references to the applicable statutory or regulatory provisions."

STATEMENT OF BASIS

PORT COMPLEX
LOOP LLC
GALLIANO, LAFOURCHE PARISH, LOUISIANA
Agency Interest (AI) No. 4634
Activity No. PER20100001
Proposed Permit No. 1560-00027-V0

V. PROPOSED PERMIT/PROJECT INFORMATION

A permit application and Emission Inventory Questionnaire were submitted by LOOP LLC on December 23, 2010 requesting a Part 70 operating permit

Pursuant to LAC 33:III.519.A.4, a notice of the completeness determination was published in *The LaFourche Gazette*, LaFourche Parish, Louisiana, on January 12, 2011.

Additional information as of February 4, 2011 was also received.

Process Description

The LOOP LLC – Port Complex consists of the Clovelly Dome Storage Terminal in Galliano, the Small Boat Harbor in Leeville, the Fourchon Booster Station in Leeville, and the Marine Offloading Terminal in Grand Isle Block 59 of the Gulf of Mexico. The Clovelly Dome Storage Terminal consists of nine underground storage caverns. These caverns provide storage for crude oil prior to pipeline delivery. Eight of the caverns have a capacity of approximately 6 MM barrels of oil, and one cavern has a capacity of 3 MM barrels of oil. The terminal also consist of surface facilities located in the same general vicinity which include a Brine Storage Reservoir, Operations Building, crude oil storage tanks, fuel and slop oil tanks, a turbine generator, and ancillary equipment. The Small Boat Harbor, which is located on Bayou Lafourche, shelters crew and work boats and includes hose testing facilities. The Fourchon Booster Station is a secured unmanned facility with two large diesel storage tanks and a few small storage tanks. Emission control systems utilized at the LOOP Complex facilities include the latest storage tank technology, mechanical seals on pumps, and low sulfur fuel oil.

Proposed Modifications

LOOP LLC proposes to expand its Clovelly Dome Storage Terminal and bring the facility under Part 70 requirements as follows:

1. Add six (6) 600,000 bbl crude oil storage tanks (Emission Point Nos. 16-10 through 21-10);
2. Add one 520 hp Emergency Generator (Emission Point 1-10);
3. Include the new tanks and the landing losses in the existing cap (Emission Point TANK CAP);
4. Update fugitive emissions based on the modification;
5. Update the emissions based on a Reid Vapor Pressure (RVP) change from 5 to 8;
6. Update the emissions of the tanks based on the existing tank fittings;

7. Remove from the inventory a Turbine Generator (Emission Point 7-78);
8. Remove from the inventory a Small Boat Harbor Fire Pump (Emission Point 16-78),
9. Update the nomenclature and emissions for the engines based on audit, AP-42 emission factors and source description; and
10. Update the insignificant activities based on the audit and modification.

VI. ATTAINMENT STATUS OF PARISH

Pollutant	Attainment Status	Designation
$PM_{2.5}$	Attainment	N/A
PM_{10}	Attainment	N/A
SO_2	Attainment	N/A
NO_2	Attainment	N/A
CO	Attainment	N/A
Ozone[2]	Attainment	N/A
Lead	Attainment	N/A

VII. PERMITTED AIR EMISSIONS

Sources of air emissions are listed on the "Inventories" page of the proposed permit. Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM_{10}	1.05	2.34	+ 1.29
SO_2	22.56	1.88	- 20.68
NO_X	45.56	51.23	+ 5.67
CO	1.76	10.01	+ 8.25
VOC **	93.82	182.59	+ 88.77

PM_{10} and VOC compounds classified as LAC 33:III.Chapter 51-regulated toxic air pollutants (TAP) are speciated below. This list encompasses all Hazardous Air Pollutants (HAP) regulated pursuant to Section 112 of the Clean Air Act. Note, however, all TAPs are not HAPs (e.g., ammonia, hydrogen sulfide).

[2] VOC and NO_X are regulated as surrogates.

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**VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):			
Pollutant	Before	After	Change
Acetaldehyde	0.001	0.04	+ 0.04
Benzene	0.924	1.20	+ 0.28
Cumene	0.023	0.03	+ 0.01
Ethyl benzene	0.124	0.15	+ 0.03
Formaldehyde	0.001	0.06	+ 0.06
n-Hexane	0.948	1.12	+ 0.17
Toluene	0.590	0.66	+ 0.07
Xylenes	0.447	0.44	- 0.01
Total	**3.06**	**3.70**	**+ 0.64**
Other VOC		**178.89**	

Port Complex is a major source of criteria pollutants, a minor source of HAPs, and a minor source of TAPs. Port Complex is considered as a minor source under the provisions of LAC 33:III.Chapter 51 and an area source of HAPs under the federal requirements.

Permitted limits for individual emissions units and groups of emissions units, if applicable, are set forth in the tables of the proposed permit entitled "Emission Rates for Criteria Pollutants" and "Emission Rates for TAP/HAP & Other Pollutants." These tables are part of the permit.

Emissions calculations can be found in Appendix D of the permit application. The calculations address the manufacturer's specifications, fuel composition (e.g., sulfur content), emissions factors, and other assumptions on which the emissions limitations are based and have been reviewed by the permit writer for accuracy.

General Condition XVII Activities

Very small emissions to the air resulting from routine operations that are predictable, expected, periodic, and quantifiable and that are submitted by the applicant and approved by the Air Permits Division are considered authorized discharges. These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. However, such emissions are considered when determining the facility's potential to emit for evaluation of applicable requirements. Approved General Condition XVII activities are noted in Section VIII of the proposed permit.

Insignificant Activities

The emissions units or activities listed in Section IX of the proposed permit have been classified as insignificant pursuant to LAC 33:III.501.B.5. By such listing, the LDEQ exempts these sources or types of sources from the requirement to obtain a permit under LAC 33:III.Chapter 5. However, such emissions are considered when determining the facility's potential to emit for evaluation of applicable requirements.

VIII. REGULATORY APPLICABILITY

Regulatory applicability is discussed in three sections of the proposed permit: Section X (Table 1), Section XI (Table 2), and Specific Requirements. Each is discussed in more detail below.

Section X (Table 1): Applicable Louisiana and Federal Air Quality Requirements

Section X (Table 1) summarizes all applicable federal and state regulations. In the matrix, a "1" represents a regulation applies to the emissions unit. A "1" is also used if the emissions unit is exempt from the emissions standards or control requirements of the regulation, but monitoring, recordkeeping, and/or reporting requirements apply.

A "2" is used to note that the regulation has requirements that would apply to the emissions unit, but the unit is exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified, or reconstructed since the regulation has been effective. If the specific criterion changes, the emissions unit will have to comply at a future date. Each "2" entry is explained in Section XI (Table 2).

A "3" signifies that the regulation applies to this general type of source (e.g., furnace, distillation column, boiler, fugitive emissions, etc.), but does not apply to the particular emissions unit. Each "3" entry is explained in Section XI (Table 2).

If blank, the regulation clearly does not apply to this type of emissions unit.

Section XI (Table 2): Explanation for Exemption Status or Non-Applicability of a Source

Section XI (Table 2) of the proposed permit provides explanation for either the exemption status or non-applicability of given federal or state regulation cited by 2 or 3 in the matrix presented in Section X (Table 1).

Specific Requirements

Applicable regulations, as well as any additional monitoring, recordkeeping, and reporting requirements necessary to demonstrate compliance with both the federal and state terms and conditions of the proposed permit, are provided in the "Specific Requirements" section. Any operating limitations (e.g., on hours of operation or throughput) are also set forth in this section. Associated with each Specific Requirement is a citation of the federal or state regulation upon which the authority to include that Specific Requirement is based.

1. Federal Regulations

40 CFR 60 – New Source Performance Standards (NSPS)

The following subparts are applicable at the Port Complex: A, Ka, Kb and IIII. Applicable emission standards, monitoring, test methods and procedures, recordkeeping, and reporting requirements are summarized in the "Specific Requirements" section of the proposed permit.

40 CFR 61 – National Emission Standards for Hazardous Air Pollutants (NESHAP)

No NESHAP provisions are applicable to the Port Complex.

40 CFR 63 – Maximum Achievable Control Technology (MACT)

The following subparts are applicable at the Fort Complex: A, ZZZZ, and CCCCCC. Applicable emission standards, monitoring, test methods and procedures, recordkeeping, and reporting requirements are summarized in the "Specific Requirements" section of the proposed permit.

Clean Air Act §112(g) or §112(j) – Case-By-Case MACT Determinations

A case-by-case MACT determination pursuant to §112(g) or §112(j) of the Clean Air Act was not required.

40 CFR 64 – Compliance Assurance Monitoring (CAM)

Per 40 CFR 64.2(a), CAM applies to each pollutant-specific emissions unit (PSEU) that 1) is subject to an emission limitation or standard, 2) uses a control devices to achieve compliance, and 3) has potential pre-control device emissions that are equal to or greater than 100 percent of the amount, in TPY, required for a source to be classified as a major source.

Port Complex is not subject to CAM requirements

Acid Rain Program

The Acid Rain Program, 40 CFR Part 72 – 78, applies to the fossil fuel-fired combustion devices listed in Tables 1-3 of 40 CFR 73.10 and other utility units, unless a unit is determined not to be an affected unit pursuant to 40 CFR 72.6(b). LDEQ has incorporated the Acid Rain Program by reference at LAC 33:III.505. Port Complex is not subject to the Acid Rain Program.

2. SIP-Approved State Regulations

Applicable state regulations are also noted in Section X (Table 1) of the proposed permit. Some state regulations have been approved by the U.S. Environmental Protection Agency (EPA) as part of Louisiana's State Implementation Plan (SIP). These regulations are referred to as "SIP-approved" and are enforceable by both LDEQ and EPA. All LAC 33:III.501.C.6 citations are federally enforceable unless otherwise noted.

3. State-Only Regulations

Individual chapters or sections of LAC 33:III noted by an asterisk in Section X (Table 1) are designated "state-only" pursuant to 40 CFR 70.6(b)(2). Terms and conditions of the proposed permit citing these chapters or sections are not SIP-approved and are not subject to the requirements of 40 CFR Part 70. These terms and conditions are enforceable by LDEQ, but not EPA. All conditions not designated as "state-only" are presumed to be federally enforceable.

IX. NEW SOURCE REVIEW (NSR)

1. Prevention of Significant Deterioration (PSD)

The facility's source category is listed in Table A of the definition of "major stationary source" in LAC 33:III.509. As such, the PSD major source threshold is 100 TPY (of any regulated NSR pollutant).

Port Complex is now a regulated facility under Prevention of Significant Deterioration (PSD) program; the facility is currently a minor source of criteria pollutants and the current changes do not constitute a major modification.

X. ADDITIONAL MONITORING AND TESTING REQUIREMENTS

In addition to the monitoring and testing requirements set forth by applicable state and federal regulations (see Section VIII of this Statement of Basis), a number of "LAC 33:III.507.H.1.a" and/or "LAC 33:III.501.C.6" conditions may appear in the "Specific Requirements" section of the proposed permit. These conditions have been added where no applicable regulation exists or where an applicable regulation does not contain sufficient monitoring, recordkeeping, and/or reporting provisions to ensure compliance. LAC 33:III.507.H.1.a provisions, which may include recordkeeping requirements, are intended to fulfill Part 70 periodic monitoring obligations under 40 CFR 70.6(a)(3)(i)(B).

Port Complex requested an emission cap for operational flexibility. See Section XI.

XI. OPERATIONAL FLEXIBILITY

Emissions Caps

An emissions cap is a permitting mechanism to limit allowable emissions of two or more emissions units below their collective potential to emit (PTE). The proposed permit does have existing emissions caps.

Port Complex shall comply with the emission limits for the emission cap (Equipment Group) TANK CAP (GRP003) associated with the proposed permit.

Port Complex is required to monitor and keep records of the emissions for each equipment based on the relevant parameters every month and for the last twelve consecutive months to show compliance with the emission limits in the proposed permit. The specific conditions can be found in the "Specific Requirements" of the proposed permit.

Alternative Operating Scenarios

LAC 33:III.507.G.5 allows the owner or operator to operate under any operating scenario incorporated in the permit. Any reasonably anticipated alternative operating scenarios may be identified by the owner or operator through a permit application and included in the permit. The proposed permit does not include an alternative operating scenario.

Streamlined Requirements

When applicable requirements overlap or conflict, the permitting authority may choose to include in the permit the requirement that is determined to be most stringent or protective as detailed in EPA's "White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program" (March 5, 1996). The overall objective is to determine the set of permit terms and conditions that will assure compliance with all applicable requirements for an emissions unit or group of emissions units so as to eliminate

redundant or conflicting requirements. The proposed permit does not contain streamlined provisions.

Louisiana Consolidated Fugitive Emission Program (LCFEP)

Port Complex does not comply with a streamlined equipment leak monitoring program.

XII. PERMIT SHIELD

A permit shield, as described in 40 CFR 70.6(f) and LAC 33:III.507.I, provides an "enforcement shield" which protects the facility from enforcement action for violations of applicable federal requirements. It is intended to protect the facility from liability for violations if the permit does not accurately reflect an applicable federal or federally enforceable requirement.

The proposed permit does not establish a permit shield.

XIII. IMPACTS ON AMBIENT AIR

Emissions associated with the proposed modification were reviewed by the Air Permits Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

XIV. COMPLIANCE HISTORY AND CONSENT DECREES

The Port Complex's compliance history can be found in Section 15.a of the permit application. It must be disclosed per LAC 33:III.517.E and 517.D.12, if applicable.

No federal or state actions have been issued since the existing permit for the Port Complex was issued and does not operate under a consent decree

XV. REQUIREMENTS THAT HAVE BEEN SATISFIED

The following state and/or federal obligations have been satisfied and are therefore not included as Specific Requirements.

Source ID	Citation	Description
NA		

XVI. OTHER REQUIREMENTS

Executive Order No. BJ 2008-7 directs all state agencies to administer their regulatory practices, programs, contracts, grants, and all other functions vested in them in a manner consistent with Louisiana's Comprehensive Master Plan for a Sustainable Coast and public interest to the maximum extent possible. If a proposed facility or modification is located in the Coastal Zone, LDEQ requires the applicant to document whether or not a Coastal Use Permit is required, and if so, whether it has been obtained. Coastal Use Permits are issued by the Coastal Management Division of the Louisiana Department of Natural Resources (LDNR).

The facility is located in the Coastal Zone; however, a Coastal Use Permit is not required.

XVII. PUBLIC NOTICE/PUBLIC PARTICIPATION

Written comments, written requests for a public hearing, or written requests for notification of the final decision regarding this permit action may be submitted to:

LDEQ, Public Participation Group
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Written comments and/or written requests must be received prior to the deadline specified in the public notice. If LDEQ finds a significant degree of public interest, a public hearing will be held. All comments will be considered prior to a final permit decision.

LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit application, proposed permit, and this Statement of Basis are available for review at LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, Louisiana. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). Additional copies may be viewed at the local library identified in the public notice. The available information can also be accessed electronically via LDEQ's Electronic Document Management System (EDMS) on LDEQ's public website, www.deq.louisiana.gov.

Inquiries or requests for additional information regarding this permit action should be directed to the contact identified on page 1 of this Statement of Basis.

Persons wishing to be included on the public notice mailing list or for other public participation-related questions should contact LDEQ's Public Participation Group at P.O. Box 4313, Baton Rouge, LA 70821-4313; by e-mail at maillistrequest@ldeq.org; or contact LDEQ's Customer Service Center at (225) 219-LDEQ (219-5337). Alternatively, individuals may elect to receive public notices via e-mail by subscribing to LDEQ's

Public Notification List Service at http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

Permit public notices can be viewed at LDEQ's "Public Notices" webpage, http://www.deq.louisiana.gov/apps/pubNotice/default.asp. Electronic access to each proposed permit and Statement of Basis current on notice is also available on this page. General information related to public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

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APPENDIX A - ACRONYMS

AAS	Ambient Air Standard (LAC 33:III.Chapter 51)
AP-42	EPA document number of the Compilation of Air Pollutant Emission Factors
BACT	Best Available Control Technology
BTU	British Thermal Units
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CAM	Compliance Assurance Monitoring, 40 CFR 64
CEMS	Continuous Emission Monitoring System
CMS	Continuous Monitoring System
CO	Carbon monoxide
COMS	Continuous Opacity Monitoring System
CFR	Code of Federal Regulations
EI	Emissions Inventory (LAC 33:III.919)
EPA	(United States) Environmental Protection Agency
EIQ	Emission Inventory Questionnaire
ERC	Emission Reduction Credit
FR	Federal Register or Fixed Roof
H_2S	Hydrogen sulfide
H_2SO_4	Sulfuric acid
HAP	Hazardous Air Pollutants
Hg	Mercury
HON	Hazardous Organic NESHAP
IBR	Incorporation by Reference
LAER	Lowest Achievable Emission Rate
LDEQ	Louisiana Department of Environmental Quality
M	Thousand
MM	Million
MACT	Maximum Achievable Control Technology
MEK	Methyl ethyl ketone
MIK	Methyl isobutyl ketone
MSDS	Material Safety Data Sheet
MTBE	Methyl tert-butyl ether
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industrial Classification System (replacement to SICC)
NESHAP	National Emission Standards for Hazardous Air Pollutants
NMOC	Non-Methane Organic Compounds

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NOx	Nitrogen Oxides
NNSR	Nonattainment New Source Review
NSPS	New Source Performance Standards
NSR	New Source Review
OEA	LDEQ Office of Environmental Assessment
OEC	LDEQ Office of Environmental Compliance
OES	LDEQ Office of Environmental Services
PM	Particulate Matter
PM10	Particulate Matter less than 10 microns in nominal diameter
PM2.5	Particulate Matter less than 2.5 microns in nominal diameter
ppm	parts per million
ppmv	parts per million by volume
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
RBLC	RACT-BACT-LAER Clearinghouse
RMP	Risk Management Plan (40 CFR 68)
SICC	Standard Industrial Classification Code
SIP	State Implementation Plan
SO2	Sulfur Dioxide
SOCMI	Synthetic Organic Chemical Manufacturing Industry
TAP	Toxic Air Pollutants (LAC 33:III.Chapter 51)
TOC	Total Organic Compounds
TPY	Tons Per Year
TRS	Total Reduced Sulfur
TSP	Total Suspended Particulate
µg/m3	Micrograms per Cubic Meter
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound
VOL	Volatile Organic Liquid
VRU	Vapor Recovery Unit

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APPENDIX B – GLOSSARY

Best Available Control Technologies (BACT) – an emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this Part (Part III) which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

CAM - Compliance Assurance Monitoring – A federal air regulation under 40 CFR Part 64.

Carbon Monoxide (CO) – (Carbon monoxide) a colorless, odorless gas produced by incomplete combustion of any carbonaceous (gasoline, natural gas, coal, oil, etc.) material.

Cooling Tower – A cooling system used in industry to cool hot water (by partial evaporation) before reusing it as a coolant.

Continuous Emission Monitoring System (CEMS) – The total combined equipment and systems required to continuously determine air contaminants and diluent gas concentrations and/or mass emission rate of a source effluent.

Cyclone – A control device that uses centrifugal force to separate particulate matter from the carrier gas stream.

Federally Enforceable Specific Condition – A federally enforceable specific condition written to limit the potential to Emit (PTE) of a source that is permanent, quantifiable, and practically enforceable. In order to meet these requirements, the draft permit containing the federally enforceable specific condition must be placed on public notice and include the following conditions:

- A clear statement of the operational limitation or condition which limits the source's potential to emit;
- Recordkeeping requirements related to the operational limitation or condition;
- A requirement that these records be made available for inspection by LDEQ personnel;
- A requirement to report for the previous calendar year.

Grandfathered Status – those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

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Lowest Achievable Emission Rate (LAER) – for any source, the more stringent rate of emissions based on the following:

a. the most stringent emissions limitation that is contained in the implementation plan of any state for such class or category of major stationary source, unless the owner or operator of the proposed stationary source demonstrates that such limitations are not achievable; or
b. the most stringent emissions limitation that is achieved in practice by such class or category of stationary source. This limitation, when applied to a modification, means the lowest achievable emissions rate for the new or modified emissions units within the stationary source. In no event shall the application of this term permit a proposed new or modified major stationary source to emit any pollutant in excess of the amount allowable under an applicable new source standard of performance.

NESHAP – National Emission Standards for Hazardous Air Pollutants – Air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63.

Maximum Achievable Control Technology (MACT) – the maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

NSPS – New Source Performance Standards – Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60.

New Source Review (NSR) – a preconstruction review and permitting program applicable to new or modified major stationary sources of criteria air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nonattainment New Source Review (NNSR) – a New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) set forth at 40 CFR Part 50. NNSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

Organic Compound – any compound of carbon and another element. Examples: methane (CH_4), ethane (C_2H_6), carbon disulfide (CS_2).

Part 70 Operating Permit – also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507.

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PM_{10} – particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – a New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Selective Catalytic Reduction (SCR) – A non-combustion control technology that destroys NO_X by injecting a reducing agent (e.g., ammonia) into the flue gas that, in the presence of a catalyst (e.g., vanadium, titanium, or zeolite), converts NO_X into molecular nitrogen and water.

Sulfur Dioxide (SO_2) – An oxide of sulphur.

TAP – LDEQ acronym for toxic air pollutants regulated under LAC 33 Part III, Chapter 51, Tables 1 through 3.

"Top Down" Approach – An approach which requires use of the most stringent control technology found to be technically feasible and appropriate based on environmental, energy, economic, and cost impacts.

Title V permit – see Part 70 Operating Permit.

Volatile Organic Compound (VOC) – any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the Administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.